

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the estate of Bernard L.  
Madoff,

Plaintiff,

v.

CITIBANK, N.A., CITIBANK NORTH  
AMERICA, INC. and CITIGROUP GLOBAL  
MARKETS LIMITED,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05345 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND  
AND ADJOURNING PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Trustee may respond to the Motion to Dismiss filed by Defendants Citibank, N.A., Citibank North America, Inc. and Citigroup Global Markets Limited (the “Defendants”) is extended up to and including August 9, 2017. It is further stipulated and agreed that the Defendants shall file any reply by November 9, 2017. The return date for this matter was previously set for September 27, 2017 at 10:00 a.m., but will be rescheduled for December 20, 2017 at 10:00 a.m. The pre-trial conference will be adjourned from October 25, 2017 at 10:00 a.m. to January 31, 2018 at 10:00 a.m.

The purpose of this stipulation extension (the “Stipulation”) is to provide additional time for the Trustee to respond to the Defendants’ Motion to Dismiss. This is the twenty-seventh such extension. Nothing in this Stipulation is a waiver of the Trustee’s right to request from the Court a further extension of time to respond to the Defendants’ Motion to Dismiss and/or the Defendants’ right to object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), ECF No. 12312).

*[Remainder of page intentionally left blank.]*

Dated: May 1, 2017  
New York, New York

/s/ David J. Sheehan  
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Substantively Consolidated SIPA Liquidation of Bernard  
L. Madoff Investment Securities LLC and the Estate of  
Bernard L. Madoff*

/s/ Carmine D. Boccuzzi, Jr.  
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*Attorneys for Defendants Citibank, N.A., Citibank North  
America, Inc. and Citigroup Global Markets Limited*

SO ORDERED: May 1<sup>st</sup>, 2017

/s/ STUART M. BERNSTEIN

Hon. Stuart M. Bernstein  
United States Bankruptcy Judge